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Proposed Counsel to Debtor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	
	§	
TEXANS CUSO INSURANCE GROUP,	§	CASE NO. 09-35981-11
LLC,	§	
	§	
Debtor.	§	
	§	

**PROPOSED AGENDA FOR SEPTEMBER 10, 2009 HEARING ON
“FIRST DAY” MATTERS**

COMES NOW, Texans CUSO Insurance Group, LLC (“Texans Insurance Group” or the “Debtor”) and propose the following agenda (the “Agenda”) for the hearing scheduled in the above-referenced bankruptcy case on **SEPTEMBER 10, 2009, AT 10:00 A.M.**, central time. The information contained in this Agenda reflects documents received by counsel to the Debtor as of the date and time this Agenda was filed.

UNCONTESTED MATTERS

1. **“Notice of Designation as Complex Chapter 11 Bankruptcy Case”**

[Docket No. 8]

Response Deadline: N/A

Status: Going forward

Opposition: There is no opposition to this Notice at the current time.

2. **“Debtor’s Emergency Motion for Order Extending Time to File**

Statements and Schedules” [Docket No. 9]

Response Deadline: N/A

Status: Going forward.

Opposition: There is no opposition to this Motion at the current time.

3. **“Debtor’s Emergency Motion for Authority to Use Cash Collateral”**

[Docket No. 16]

Response Deadline: N/A

Status: Going forward.

Opposition: Subject to finalizing the order with the Debtor’s secured lender, which the Debtor anticipates being done before the hearing, the Debtor is not aware of any opposition.

POTENTIALLY CONTESTED MATTERS

1. **“Debtor’s Motion to Honor Prepetition Compensation and Benefits of**

Employees” [Docket No. 11]

Response Deadline: N/A

Status: Going forward

Opposition: There is no opposition at this time. However, certain parties have indicated they may have questions. For this reason, it is listed as potentially contested.

2. “Debtor’s Motion for Order Authorizing Debtor to Remit Premium Payments to Insurance Companies and Continue Such Practice in the Ordinary Course of Business” [Docket No. 13]

Response Deadline: N/A

Status: Going forward.

Opposition: There is no current opposition at this time, however, parties have indicated they have questions. The Debtor is still providing information to various parties. For this reason, it is listed as potentially contested.

3. “Debtor’s Motion for Authorization to Maintain Insurance Financing and Insurance Policies and to Pay Certain Pre-Petition Insurance Related Obligations” [Docket No. 14]

Response Deadline: N/A

Status: Going forward.

Opposition: There is no current opposition at this time, however, parties have indicated they have questions. The Debtor is still providing information to various parties. For this reason, it is listed as potentially contested.

CONTESTED MATTERS

1. “Debtor’s Motion for Order Authorizing Debtor to Pay Pre-Petition Independent Agent Commissions and Continue Payment in the Ordinary Course of Business” [Docket No. 12]

Response Deadline: N/A

Status: Going forward

Opposition: The United States Trustee opposes at this time.

MATTERS NOT GOING FORWARD

1. “Application to employ Rochelle McCullough, LLP as Attorney for Debtor and Debtor In Possession” [Docket No. 15]

Response Deadline: N/A

Status: Will be Set for Hearing in 23 days.

Opposition: The U.S. Trustee’s office opposes on Rule 6003 Grounds.

2. “Motion for Order Authorizing (1) Maintenance of Existing Bank Accounts and Business Forms, and (2) Continued Use of Existing Cash Management System” [Docket No. 10]

Response Deadline: N/A

Status: Not Going forward.

Opposition: The U.S. Trustee has indicated that the Debtor’s current depository is not on the approved list. Accordingly, the Debtor will move its accounts from the existing depository institution.

Respectfully submitted,

/s/Scott M. DeWolf
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on the parties on the attached service list via ECF, E-Mail and/or U.S. Mail on September 9, 2009.

/s/ Scott M. DeWolf
Scott M. DeWolf

Rochelle McCullough, LLP

Texans CUSO Insurance Group, LLC
Master Service List as of 09/09/09

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